

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

NAUTILUS INSURANCE COMPANY,

Plaintiff,

v.

RICHARD ALEXANDER MURDAUGH,
SR., CORY FLEMING, MOSS & KUHN,
P.A., CHAD WESTENDORF, and
PALMETTO STATE BANK,

Defendants.

Case No.: 2:22-cv-1307-RMG

**PLAINTIFF NAUTILUS INSURANCE
COMPANY'S MOTION TO DEPOSE
DEFENDANT CORY FLEMING**

Plaintiff Nautilus Insurance Company (“Nautilus”) moves pursuant to F.R.C.P. 30(a)(2)(B) for leave from the Court to take the deposition of Mr. Cory Fleming (“Mr. Fleming”).

Mr. Fleming, a named Defendant in this action, is currently an inmate of Federal Correctional Institution (“FCI”) Jesup in South Jesup, Georgia. Mr. Fleming and his law firm, at the request of Mr. Murdaugh, represented Gloria Satterfield’s estate and her beneficiaries, purportedly to advance wrongful death and survival claims against Mr. Murdaugh himself. Nautilus has alleged, *inter alia*, that Mr. Fleming knew Mr. Murdaugh planned to wrongfully obtain and steal some or all of the funds conditionally paid by Nautilus; that, in furtherance of the broader scheme, Mr. Fleming coordinated and facilitated the replacement of one of Satterfield’s sons as the original Personal Representative of her estate with a Vice President of Defendant Palmetto State Bank, Defendant Chad Westendorf, to ensure that knowledge of and control over the funds exclusively among the participating Defendants; and, that Mr. Fleming further acted in concert with his co-Defendants to conceal their actions from Nautilus and the world.

Accordingly, given his significance as both a named party and a key witness to material facts in controversy, Nautilus respectfully requests leave from this Court to take Mr. Fleming’s deposition.

Respectfully submitted:

This 30th day of November, 2023
Charleston, South Carolina

/s/ Jaan Rannik
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COMPANY*